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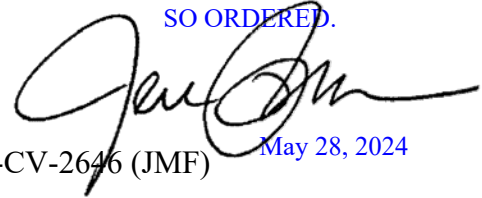
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Application GRANTED, subject to reconsideration in the event that any party or third party files a motion to unseal a particular document or documents. Plaintiff shall file proposed redactions on the public docket no later than **May 30, 2024**. Moving forward, the parties should adhere to Rule 7(C)(iii) of the Court's Individual Rules for documents that they wish to file in redacted form on the public docket -- that is, the parties should propose a redacted version at the time of the initial filing, rather than bifurcate their requests for sealing (of the unredacted version) and redacting. The Clerk is directed to terminate ECF No. 35.

May 24, 2024

Hon. Jesse M. Furman
United States District Court
40 Centre Street, Room 2202
New York, NY 10007

SO ORDERED.



May 28, 2024

Re: *ChemImage Corp. v. Johnson & Johnson et al.*, No. 1:24-CV-2646 (JMF)
Letter Motion For Leave to Seal

Dear Judge Furman:

On behalf of Plaintiff ChemImage Corporation ("ChemImage"), we write pursuant to Federal Rule of Civil Procedure 5.2(d), this Court's Standing Order 19-MC-583, and Rule 7(C) of the Court's Individual Rules and Practices in Civil Cases to respectfully seek leave to seal (i) Plaintiff ChemImage's Amended Complaint, (ii) the Agreement annexed thereto as Exhibit 1, and (3) the requisite redline showing all differences between the original and revised filing as requested by the Court. *See* Dkt. 28.

On April 4, 2024, ChemImage filed a Motion for Leave to File Complaint Under Seal, which was granted on April 5, 2024. *See* 1:24-MC-00618-LTS, Dkt. 3 (Order on Motion for Leave to File Complaint Under Seal). Pursuant to that order, ChemImage filed its Complaint under seal on April 8, 2024. *See* Dkt. 3. ChemImage thereafter conferred with Defendants Ethicon, Inc. ("Ethicon") and Johnson & Johnson ("J&J" and, together with Ethicon, "Defendants") to agree on a narrowly tailored set of redactions to the Complaint and exhibit, which this Court acknowledged and approved on April 26, 2024. *See* Dkt. 16. On May 6, 2024, the Court ordered Plaintiff to file any amended complaint by May 24, 2024, along with a redline showing all differences between the original and revised filing. *See* Dkt. 28.

The Amended Complaint is substantially similar to ChemImage's Original Complaint and includes the same confidential information that formed the basis of ChemImage's request to seal the Original Complaint. Accordingly, ChemImage respectfully requests that the Court seal its Amended Complaint as well as the attachments thereto. As soon as practicable following this submission, ChemImage will confer with Defendants and agree to a permanent public version of the Amended Complaint and Exhibit.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Courtney C. Whang

Courtney C. Whang